






















Activities Export

08/31/2018
3:41 PM

Date	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
11/07/2017		Email to Cosgriff about failure to comply with court order.  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
11/14/2017		Drafted Compliance Letter to Cosgriff regarding deficiencies in discovery responses, (3.5) reviewed file for correspondence (.5), reviewed discovery responses at length (2.0)  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	6.00	350.00	2,100.00
11/15/2017		completed compliance letter and mailed to Cosgriff, (3.7) continued review of file and Defendants' various discovery responses (2.5)  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	6.20	350.00	2,170.00
12/04/2017		Drafted Motion for Sanctions, reviewed responses from Defendants, email to Cosgriff regarding request for extension (.1)  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	1.40	350.00	490.00
12/13/2017		Emails to Cosgriff regarding Defendants' failure to comply with Court Order, Discussed Filing Second Motion for Sanctions  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.30	350.00	105.00
12/14/2017		Reviewed Cosgriff Letter to Court, Meeting with MKD to discuss  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
12/15/2017		Prepared Letter to Court regarding Cosgriff Request for Conference, finalized and filed on ECF system  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.50	350.00	175.00












Activities Export

08/31/2018
3:41 PM

Date ▲	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
12/18/2017		Reviewed Cosgriff Letter to Court Regarding Discovery Dispute ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
12/19/2017		Reviewed ECF Notice denying hearing ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.10	350.00	35.00
01/03/2018		Prepared, Finalized and Filed Transcript Request on ECF system ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.40	350.00	140.00
01/11/2018		Transcript Order for September 20, 2017 Discovery Hearing ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	-	111.55	111.55
01/11/2018		received Court transcript, email with Maria about receipt, possible contact with the Court. ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
01/16/2018		drafted second motion for sanctions, (2.5) reviewed Defendants' discovery responses, reviewed and summarized transcript of Court Proceeding, (2.0) reviewed court documents and past motion filings (1.0), summarized past procedural history of case (1.0) ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	6.50	350.00	2,275.00
01/17/2018		Assisted in Prep for Motion DN 43 i. Locating and preparing exhibits (.8) ii. Reviewing Affidavit (.3) iii. Meeting with Bob (.5) iv. Researched standard for sanction, draft legal section (p. 3-5) (1.5) ● Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	3.10	250.00	775.00

Activities Export

08/31/2018
3:41 PM

Date	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
01/17/2018		continued drafting Second Motion for Sanctions, continued summarizing transcript of court proceedings, case docket, (2.2), phone calls with Maria about Exhibits (.2), reviewed, summarized in affirmation and numbered extensive exhibits for motion filing, including review of correspondence, compliance letter, discovery responses, discovery documents, and email (7.4), research on standard for sanctions, striking of answer, willful noncompliance (1.5), reviewed and revised MKD memo of law on sanctions, drafted introduction (1.5), prepared cert of service (.2), compiled all papers for filing, filed on ECF system (1.0)  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	14.00	350.00	4,900.00
01/19/2018		Reviewed Court scheduling order  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
02/08/2018		Reviewed CMC response to Motion for Sanctions  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.40	350.00	140.00
02/09/2018		Reviewed email from Court about motion filing, direction to Thabie to forward hard copy to chambers.  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.30	350.00	105.00
02/22/2018		Travel Time to and from Rochester for Sanctions Hearing  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	6.50	175.00	1,137.50
02/22/2018		Preparation for Hearing, including review of motion papers, lunch meeting with Maria to strategize for hearing presentation (2.5), pre-	00243-Howell Howell Sanctions Application	Elmer Keach	5.90	350.00	2,065.00










Activities Export

08/31/2018
3:41 PM

Date	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
		and post-hearing meetings with client (.4), participate in hearing before Magistrate Judge Payson, participate in oral argument, meeting with Judge Payson's law clerk in effort to reach agreement, continuation of hearing with Court (3.0 hours) ● Unbilled					
02/22/2018	\$	450 miles round trip drive from Albany to Rochester, \$.545 per mile, thruway tolls, \$18.14 ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	-	263.39	263.39
02/22/2018	\$	Meals-Breakfast, Dinner ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	-	64.98	64.98
02/22/2018	🕒	Travel Time to and from Rochester for Sanctions Hearing ● Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	6.50	125.00	812.50
02/22/2018	🕒	Preparation for Hearing, including review of motion papers, lunch meeting with Maria to strategize for hearing presentation (2.5), pre- and post-hearing meetings with client (.4), participate in hearing before Magistrate Judge Payson, participate in oral argument, meeting with Judge Payson's law clerk in effort to reach agreement, continuation of hearing with Court (3.0 hours) ● Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	5.90	250.00	1,475.00
02/22/2018	\$	Parking ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	-	4.50	4.50
02/26/2018	🕒	Reviewed Court Order ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00

Activities Export

08/31/2018
3:41 PM

Date ▲	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
03/07/2018		Reviewed Cosgriff letter, Court Order ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
03/19/2018		Email to Cosgriff regarding request for extension, deficiencies in production (.3), internet research on weather in Philadelphia (.2) ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.50	350.00	175.00
04/04/2018		Email to Cosgriff about production, prepared, finalized and filed transcript request ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.50	350.00	175.00
04/11/2018		Exchange of email with Cosgriff regarding document production ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
04/11/2018		drafted, finalized and filed letter to court regarding filing supplemental motion for sanctions ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.40	350.00	140.00
04/16/2018		email to Thabie about getting court transcript ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.10	350.00	35.00
04/30/2018		Transcript Order -- February 22, 2018 Sanctions Hearing ● Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	-	208.05	208.05
06/01/2018		Reviewed Keach affirmation ● Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	0.50	250.00	125.00
06/01/2018		prepared and finalized supplemental affirmation in support of motion for sanctions, (2.9), reviewed prior court filings and prior motions (1.0), reviewed and	00243-Howell Howell Sanctions Application	Elmer Keach	11.30	350.00	3,955.00













Activities Export

08/31/2018
3:41 PM

Date	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
		summarized transcript of hearing before the Court (2.0), reviewed Defendants' discovery responses (1.5), internet research on corporate tax returns, Schedule K-1 (1.5). Compiled, finalized and filed on ECF system (.7). Prepared cert of service (.2). ● Unbilled					
08/20/2018	🕒	<p>Prep time for Sanctions Hearing</p> <p>o Review prior Motions to compel/Sanctions/ responses thereto, compared Defendants supp responses to demands. Prepared chart of all deficient responses (2.0)</p> <p>o Telephone conference with Bob about preparing for hearing (.2)</p> <p>o Discussion with Client hearing, and grievances he filed. (.3)</p> <p>● Unbilled</p>	00243-Howell Howell Sanctions Application	Maria Dyson	2.50	250.00	625.00
08/21/2018	\$	<p>Parking</p> <p>● Unbilled</p>	00243-Howell Howell Sanctions Application	Maria Dyson	-	3.00	3.00
08/21/2018	\$	<p>Meals (coffee, pastry, water/snacks for road, lunch.)</p> <p>● Unbilled</p>	00243-Howell Howell Sanctions Application	Maria Dyson	-	19.28	19.28
08/21/2018	\$	<p>Gas for rental car</p> <p>● Unbilled</p>	00243-Howell Howell Sanctions Application	Maria Dyson	-	25.35	25.35
08/21/2018	\$	<p>Rental Car</p> <p>● Unbilled</p>	00243-Howell Howell Sanctions Application	Maria Dyson	-	151.37	151.37
08/21/2018	\$	<p>Tolls</p> <p>● Unbilled</p>	00243-Howell Howell Sanctions Application	Maria Dyson	-	19.10	19.10

Activities Export

08/31/2018
3:41 PM

Date	Type	Description	Matter	User	Hours	Rate (\$/hr)	Total (\$)
08/21/2018		Travel Time: Picking up, filling gas, and return rental car, round trip drive to Syracuse.  Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	7.50	125.00	937.50
08/21/2018		Prep before Hearing * going over chart of deficient responses, reading prior hearing transcript/Meeting with Client (.8) Post Hearing Meeting with Client (.2)  Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	1.00	250.00	250.00
08/21/2018		Hearing on 2nd Sanctions Motion; discussion with Bob about hearing and strategizing going forward  Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	1.20	250.00	300.00
08/21/2018		Telephone call with Maria regarding sanctions hearing  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.60	350.00	210.00
08/22/2018		Reviewed Court Order awarding sanctions  Unbilled	00243-Howell Howell Sanctions Application	Elmer Keach	0.20	350.00	70.00
08/22/2018		Reviewed Decision and Order from Court on Sanctions Motion.  Unbilled	00243-Howell Howell Sanctions Application	Maria Dyson	0.20	250.00	50.00
					92.10h		\$27,378.07